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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

ANNE BRYANT, ELLEN BERNFELD,
and GLORYVISION, LTD.,

Doc. No. 07-Civ-3050 (CLB)

Plaintiffs,

-against-

EUROPADISK, LTD., MEDIA RIGHT
PRODUCTIONS, INC., VERY COOL MEDIA,
INC., DOUGLAS MAXWELL, THE ORCHARD
ENTERPRISES, INC. and RUSSELL J.
PALLADINO,

Defendants.

-----X

**NOTICE OF MOTION FOR
PARTIAL SUMMARY
JUDGMENT AS TO
LIABILITY FOR ALL
COUNTS AGAINST
DEFENDANTS PURSUANT TO
F.R.C.P. RULE 56.**

To: Mitchell C. Shelowitz, Esq.
Shelowitz Broder LLP
11 Penn Plaza 5th Floor
New York, NY 10001
Counsel For Defendants

PLEASE TAKE NOTICE that the Plaintiffs herein by their
attorneys Monaghan, Monaghan, Lamb & Marchisio, LLP, respectfully
move this Court as follows:

TIME AND PLACE OF MOTION

The Courtroom of Magistrate Lisa Margaret Smith in the United States Court, Southern District of New York, 300 Quarropas Street, Room 428, White Plains, NY 10601, at a date and time to be set by the Court.

RELIEF SOUGHT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiffs seek Partial Summary Judgment against Defendants MEDIA RIGHT PRODUCTIONS, INC., DOUGLAS MAXWELL and THE ORCHARD ENTERPRISES, INC. granting Summary Judgment in their favor as to all counts in the Complaint as to liability only.

SUPPORTING PAPERS

Supporting papers in this Motion include the Declaration of Patrick J. Monaghan, Jr., Esq. dated June 6, 2008 with supporting exhibits; The Declarations of Anne Bryant and Ellen Bernfeld, dated June 6, 2008 with supporting exhibits, a Statement of Material Facts with a supporting exhibit; and a Memorandum of Law in Support of the Motion for Partial Summary Judgment.

DATED: Montvale, New Jersey
June 6, 2008

MONAGHAN, MONAGHAN, LAMB &
MARCHISIO, LLP

By: 

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